

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS**

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE; and
MASSACHUSETTS INSTITUTE OF
TECHNOLOGY,

Plaintiffs,

v.

Civil Action No. 1:20-cv-11283-ADB

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY; U.S.
IMMIGRATION AND CUSTOMS
ENFORCEMENT; CHAD F. WOLF, in his
official capacity as Acting Secretary of the
United States Department of Homeland
Security; and MATTHEW ALBENCE, in his
official capacity as Acting Director of U.S.
Immigration and Customs Enforcement,

Defendants.

DECLARATION OF STUDENT #4

I, Student #4, hereby state under the penalty of perjury that the following statements are true and accurate to the best of my knowledge:

1. I am a rising second-year student at Harvard Medical School pursuing a joint M.D./Ph.D. degree. I am not revealing my name or certain facts that may reveal my identity due to fears that, based on my participation in this litigation or information disclosed in this declaration, I could face retaliation from immigration authorities or harm in my home country or elsewhere.

2. I am currently living in Cambridge, Massachusetts. The M.D./Ph.D. program requires students to complete research over the summer and I have been conducting that research at the Koch

Institute for Integrative Cancer Research at MIT. The summer program ends in early September, and I had planned to start the second year of my program virtually from Cambridge in the fall.

3. I am originally from Ethiopia, and I am studying in the United States on an F-1 visa. I was issued an F-1 visa in 2013 when I was 17 years old, and started my undergraduate studies at a college in North Carolina. After my first year, I transferred to a university in the Boston area, and graduated from that university in 2017. After graduation, I worked in the United States through the Optional Practical Training (“OPT”) program, which allowed me to maintain temporary employment related to my area of study. I worked for a biotechnology company based in Watertown, Massachusetts. I enrolled at Harvard Medical School in 2019.

4. If the COVID-19 and Fall 2020 directive issued by United States Immigration and Customs Enforcement on July 6, 2020 takes effect, I will be required to leave the United States because Harvard Medical School is conducting my program through only virtual courses during the fall semester.

5. If I have to leave the United States and return to Ethiopia, I will be forced to defer my second year at Harvard Medical School for several reasons. First, Ethiopia is currently experiencing significant civil unrest, and I am concerned for my safety if I were to return at this time. Second, the Ethiopian government has recently shut down the Internet in response to the civil unrest. Even if the government were to allow access to the internet, the Internet connection would be unreliable, making it difficult if not impossible, to participate in my online courses. And finally, even if the Internet were adequate to participate in online course work, the seven-hour time difference would require me to keep unusual, impractical hours to attend class and collaborate with my classmates. For those reasons, if I have to return home, I will need to defer my education for the year.

6. A deferral would be significant because the M.D./Ph.D. program is very long. The full program takes anywhere between six and ten years to complete, depending on the length of time required for the student to complete her Ph.D. work.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this day, July 13, 2020

/s/ Student #4
Student #4